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Attorneys for Non-Parties
SANDSTONE GROUP, LLC,
TYTO LIDAR, LLC, and
OGNEN STOJANOVSKI

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC

Plaintiff,

v.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING LLC

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF ADRIAN J. SAWYER
IN SUPPORT OF DEFENDANTS'
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF THEIR
RESPONSE TO WAYMO LLC'S
SUPPLEMENTAL BRIEF FOR MOTION
FOR ORDER TO SHOW CAUSE**

1 I, Adrian J. Sawyer, hereby declare as follows:

2 1. I am an attorney licensed to practice before all courts of the State of California. I
3 am a partner in the law firm of Kerr & Wagstaffe LLP, attorneys for non-parties Sandstone
4 Group, LLC, Tyto LiDAR, LLC, and Ognen Stojanovski. I have personal knowledge of the
5 matters stated herein and if called upon would testify competently thereto.

6 2. I make this declaration in support of Defendants' Administrative Motion to File
7 Under Seal Portions of Their Response to Waymo LLC's Supplemental Brief for Motion for
8 Order to Show Cause (Dkt. 1591). I have reviewed the Administrative Motion to File Under
9 Seal (the "Administrative Motion"), together with Defendants' Response to Waymo LLC's
10 Supplemental Brief for Motion for Order to Show Cause (the "Response") (Dkt. 1591-4), and
11 those exhibits to Defendants' Response sought to be filed under seal.

12 3. Tyto LiDAR and Sandstone Group are non-parties and are existing limited
13 liability companies. Mr. Stojanovski is likewise a non-party. All of the information designated
14 by Tyto LiDAR, Sandstone Group, or Mr. Stojanovski and included in the Response was
15 designated confidential. None of the information was designated highly confidential/AEO by
16 Tyto LiDAR, Sandstone Group, or Mr. Stojanovski.

17 4. The yellow highlighted portions of the Response contain confidential information
18 regarding the ownership and structure of non-party Sandstone Group, financing of Sandstone
19 Group, the ownership of Tyto LiDAR, and the financing of Tyto LiDAR. Because Sandstone
20 Group and Tyto LiDAR are non-parties and existing private companies, they request that their
21 confidentiality interests in this ownership and financing information be respected in this
22 proceeding.

23 5. Exhibit 2 to the Response consists of portions of the deposition of Ognen
24 Stojanovski, taken in this action. The Administrative Motion states that Tyto LiDAR, Sandstone
25 Group, or Mr. Stojanovski seek to seal the entirety of Exhibit 2. In fact, Tyto LiDAR, Sandstone
26 Group, or Mr. Stojanovski seek to seal only certain portions of Exhibit 2: page 35, lines 22
27 through 25 and page 37, lines 1 through 16 and 25.

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6. Page 35, lines 22 through 25 and page 37, lines 1 through 16 and 25 of Exhibit 2 reflect confidential information regarding the ownership and structure of non-party Sandstone Group, financing of Sandstone Group, the ownership of Tyto LiDAR, and the financing of Tyto LiDAR. Because Sandstone Group and Tyto LiDAR are non-parties and existing private companies, they request that their confidentiality interests in this ownership and financing information be respected in this proceeding.

7. Defendants' request to seal is narrowly tailored to those exhibits to Defendants' Response that merit sealing.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 19th day of September, 2017 at San Francisco, California.

/s/ Adrian J. Sawyer
ADRIAN J. SAWYER